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August 5, 2022

By ECF

Hon. Anne Y. Shields
United States Magistrate Judge
United States District Court
Eastern District of New York
Alfonse M. D'Amato Federal Building
100 Federal Plaza
Central Islip, NY 11722

Re: Joseph Jackson v. Nassau County et al., Docket No. 18-cv-3007 (JS) (AYS)
Our File No.: 12473.00014

Dear Judge Shields:

Wilson Elser represents the defendants in the above-referenced action. On July 25, 2022, plaintiff filed a renewed motion for sanctions (D.E. 366). On July 27, 2022, we filed an opposition to plaintiff's renewed sanctions motion (D.E. 367, 368). On August 3, 2022, plaintiff filed a reply to our opposition (D.E. 369).

We respectfully submit that plaintiff's reply, which primarily contains impermissible sur-reply arguments, confirms the need for oral argument on this motion. Among other things, plaintiff's reply improperly attempts to inject new unsupported arguments that the defendants will otherwise be denied an opportunity to address with the Court. As a result, we request oral argument on this motion.

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

A handwritten signature in black ink, appearing to read 'J. Vitagliano', is written over a horizontal line. Below the line, the name 'John A. Vitagliano' is printed in a standard font.

Cc: Counsel of Record (via ECF)

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